

— LAW OFFICES —
DECOTIIS
DeCotiis, FitzPatrick, Cole & Giblin, LLP
61 SOUTH PARAMUS ROAD, SUITE 250
PARAMUS, NEW JERSEY 07652

NEW JERSEY
NEW YORK

TELEPHONE: (201) 928-1100
TELEFAX: (201) 928-0588
WWW.DECOTIISLAW.COM

ADRIEN MONCUR, ESQ
AMONCUR@DECOTIISLAW.COM
201.347.2115

March 6, 2024

Via PACER

The Honorable J. Brendan Day, U.S.M.J.
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
Room 7E
402 E. State Street
Trenton, NJ 08608

Re: Kyhallista Johnson v. State of New Jersey, at al.
Docket No. 3:18-cv-11299-GC-JBD

Dear Judge Day:

This firm has recently been engaged to represent defendants State of New Jersey and John T. Nichols in the above-referenced matter. The outgoing Deputy Attorney General, who advised the Court of his impending departure by letter dated February 15, 2024 (Docket Entry 126), is no longer with the Attorney General's Office and so we have today filed a notice of appearance on behalf of our firm, rather than a substitution of counsel.

Under Your Honor's Text Order of February 16, 2024 (Docket Entry 127), the State defendants' reply submissions in support of summary judgment are due March 15, 2024. In light of our having been engaged within the past week, we respectfully request an additional two weeks in which to file our reply brief. (The briefing of the motion is being done pursuant to the "alternative" procedure of not filing any papers until all papers are ready for filing.) Plaintiff's attorney, Glenn A. Garber, Esq., and the Long Branch defendants' attorney, Brian Trelease, Esq., have both consented to this request.

We are aware that the Text Order of February 16, 2024, provides that no further extensions will be granted. We respectfully request a relaxation of that admonition under the circumstances presented. In support of that request, we note that, throughout the briefing of the summary judgment motion, the parties have cooperated in consenting to reasonable extensions, and can

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represent to the Court that no further extension beyond the two-week extension sought by this letter will be requested.

Thank you for your consideration of this request. Should Your Honor have any questions related to this request, we are of course available at the Court's convenience.

Respectfully yours,

DeCotiis, FitzPatrick, Cole & Giblin, LLP
Attorneys for Defendants State of New
Jersey and John T. Nichols

/s/ Adrien Moncur

Adrien Moncur, Esq.

SO ORDERED this 8th day of March, 2024.
All defendants may serve their reply briefs
no later than March 20, 2024.



J. BRENDAN DAY

UNITED STATES MAGISTRATE JUDGE